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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISIONJESSE E. CLARK, CLERK
BY DEPUTY: *mtasquez*

UNITED STATES OF AMERICA *

vs *

CRIMINAL NO. **B-83-777** 1

FRANCISCA GARCES-MORENO ' *

MARIO SILVA-VILLARREAL ' *

MARIA MAGDALENA URIBE-SILVA ' *

FRANCISCO SILVA-VILLARREAL ' *

BERTA ALICIA GARCIA-SILVA, *

HUMBERTO MIRELES-SALAZAR *

I N D I C T M E N T

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1

That from on or about November 3, 1978, to the present, within the Southern District of Texas, and elsewhere, in a matter within the jurisdiction of the United States Immigration and Naturalization Service, an agency of the United States, FRANCISCA GARCES-MORENO, MARIO SILVA-VILLARREAL, MARIA MAGDALENA URIBE-SILVA, FRANCISCO SILVA-VILLARREAL, BERTA ALICIA GARCIA-SILVA, and HUMBERTO MIRELES-SALAZAR, knowingly and intentionally did combine, conspire, confederate, and agree together and with each other and with other persons unknown to the Grand Jurors to knowingly and wilfully, trick, scheme, and device, make or cause to be made false writings in documents containing materially false, fictitious, and fraudulent statements, knowing said documents to contain such statements in violation of Section 371 and 1001, Title 18, United States Code.

Pursuant to and for the purpose of carrying out said unlawful combination, confederation, conspiracy and agreement and

to effectuate the objects thereof, the following and other overt acts were committed within the Southern District of Texas, and elsewhere:

Overt Acts

1. That in or about November, 1978, MARIO SILVA-VILLARREAL and MARIA MAGDALENA URIBE-SILVA met in Brownsville, Texas, with FRANCISCA GARCES-MORENO, a midwife.
2. That in or about November, 1978, in Brownsville, Texas, MARIO SILVA-VILLARREAL and MARIA MAGDALENA URIBE-SILVA paid an undisclosed amount of money to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false birth information of his son, M [REDACTED] S [REDACTED] J [REDACTED]
3. That on or about November 3, 1978, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth certificate for M [REDACTED] S [REDACTED] J [REDACTED], at the Cameron County Clerk's Office.
4. That in or about November, 1978, a Texas birth certificate was issued by the Cameron County Clerk's Office to M [REDACTED] S [REDACTED] J [REDACTED]
5. That in or about January, 1979, Gonzalo Garcia-Garcia met with FRANCISCA GARCES-MORENO in Brownsville, Texas.
6. That on or about February 10, 1979, Gonzalo Garcia-Garcia paid FRANCISCA GARCES-MORENO \$250 to obtain a Texas birth certificate for his daughter, G [REDACTED] A [REDACTED] G [REDACTED] based on false information.
7. That on or about February 14, 1979, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth

certificate for G [REDACTED] A [REDACTED] G [REDACTED] at the Cameron County Clerk's Office.

8. That in or about February, 1979, a Texas birth certificate was issued to G [REDACTED] A [REDACTED] G [REDACTED] by the Cameron County Clerk's Office.
9. That in or about February, 1979, Maria Del Rosario Santa Cruz-Serna met with FRANCISCA GARCES-MORENO in Brownsville, Texas.
10. That in or about February, 1979, Maria Del Rosario Santa Cruz-Serna paid \$155 to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false information for her daughter P [REDACTED] S [REDACTED]
11. That on or about February 14, 1979, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth certificate for P [REDACTED] S [REDACTED] at the Cameron County Clerk's Office.
12. That in or about February, 1979, a Texas birth certificate was issued to P [REDACTED] S [REDACTED] by the Cameron County Clerk's Office.
13. That in or about February, 1979, Antonio Hernandez-Gonzalez met in Brownsville, Texas, with FRANCISCA GARCES-MORENO.
14. That in or about February, 1979, Antonio Hernandez-Gonzalez paid \$175 to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false information for his son A [REDACTED] & J [REDACTED] H [REDACTED].

15. That on or about February 21, 1979, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth certificate for A [REDACTED] d [REDACTED] J [REDACTED] H [REDACTED] at the Cameron County Clerk's Office.
16. That in or about February, 1979, a Texas birth certificate was issued for A [REDACTED] d [REDACTED] J [REDACTED] H [REDACTED] by Cameron County Clerk's Office.
17. That in or about February, 1979, Matias Alejandro Lopez and Maria Margarita Garcia met with FRANCISCA GARCES-MORENO in Brownsville, Texas.
18. That in or about February, 1979, Matias Alejandro Lopez and/or Maria Margarita Garcia paid an undisclosed amount of money to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false information for their daughter Z [REDACTED] L [REDACTED]
19. That on or about February 28, 1979, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth certificate for Z [REDACTED] L [REDACTED] at the Cameron County Clerk's Office.
20. That in or about February, 1979, a Texas birth certificate was issued by the Cameron County Clerk's Office to Z [REDACTED] L [REDACTED].
21. That in or about February, 1979, FRANCISCO SILVA-VILLARREAL and BERTA ALICIA GARCIA SILVA met with FRANCISCA GARCES-MORENO in Brownsville, Texas.
22. That in or about February, 1979, in Brownsville, Texas, FRANCISCO SILVA-VILLARREAL and BERTA ALICIA GARCIA-SILVA

- paid an undisclosed amount of money to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false information for their son, F [REDACTED] S [REDACTED], Jr.
23. That on or about February 28, 1979, FRANCISCA GARCES-MORENO filed, or caused to be filed a Texas birth certificate for F [REDACTED] S [REDACTED], Jr., at the Cameron County Clerk's Office.
24. That in or about February, 1979, a Texas birth certificate was issued by the Cameron County Clerk's Office to F [REDACTED] S [REDACTED] Jr.
25. That in or about March, 1979, Antonio Hernandez and Clara Vega met with FRANCISCA GARCES-MORENO in Brownsville, Texas.
26. That in or about March, 1979, Antonio Hernandez and Clara Vega paid an undisclosed amount of money to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false information for their daughter A [REDACTED] L [REDACTED] H [REDACTED].
27. That in or about March 12, 1979, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth certificate for A [REDACTED] L [REDACTED] H [REDACTED] at the Cameron County Clerk's Office.
28. That in or about March, 1979, a Texas birth certificate was issued by the Cameron County Clerk's Office to A [REDACTED] L [REDACTED] H [REDACTED].
29. That in or about March, 1979, Antonio Hernandez and Clara Vega met with FRANCISCA GARCES-MORENO in Brownsville, Texas.

30. That in or about March, 1979, Antonio Hernandez and Clara Vega paid an undisclosed amount of money to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false information for their son P [REDACTED] A [REDACTED] H [REDACTED].
31. That on or about March 12, 1979, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth certificate for P [REDACTED] A [REDACTED] H [REDACTED] at the Cameron County Clerk's Office.
32. That in or about March, 1979, a Texas birth certificate was issued by the Cameron County Clerk's Office to P [REDACTED] A [REDACTED] H [REDACTED].
33. That in or about June, 1980, HUMBERTO MIRELES-SALAZAR met with FRANCISCA GARCES-MORENO in Brownsville, Texas.
34. That in or about June, 1980, HUMBERTO MIRELES-SALAZAR paid an undisclosed amount of money to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false information for his daughter M [REDACTED] L [REDACTED] M [REDACTED].
35. That on or about June 6, 1980, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth certificate for M [REDACTED] L [REDACTED] M [REDACTED] at the Cameron County Clerk's Office.
36. That in or about June, 1980, a Texas birth certificate was issued by the Cameron County Clerk's Office to M [REDACTED] L [REDACTED] M [REDACTED].

37. That in or about June, 1981, HUMBERTO MIRELES-SALAZAR met with FRANCISCA GARCES-MORENO in Brownsville, Texas.
38. That in or about June, 1981, HUMBERTO MIRELES-SALAZAR paid an undisclosed amount of money to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false information for his son, H [REDACTED] M [REDACTED], J [REDACTED]
39. That on or about June 5, 1981, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth certificate for H [REDACTED] M [REDACTED], J [REDACTED], at the Cameron County Clerk's Office.
40. That in or about June, 1981, a Texas birth certificate was issued by the Cameron County Clerk's Office to H [REDACTED] M [REDACTED], J [REDACTED]
41. That in or about May, 1982, Maria Del Rosario Santa Cruz-Serna met with FRANCISCA GARCES-MORENO in Brownsville, Texas.
42. That in or about May, 1982, Maria Del Rosario Santa Cruz-Serna paid \$250 to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false information for her son R [REDACTED] S [REDACTED]
43. That in or about May 14, 1982, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth certificate for R [REDACTED] S [REDACTED] at the Cameron County Clerk's Office.
44. That in or about May, 1982, a Texas birth certificate was issued by the Cameron County Clerk's Office to R [REDACTED] S [REDACTED]

45. That in or about November, 1982, FRANCISCO SILVA-VILLARREAL and BERTA ALICIA GARCIA-SILVA met with FRANCISCA GARCES-MORENO in Brownsville, Texas.
46. That in or about November, 1982, FRANCISCO SILVA-VILLARREAL and BERTA ALICIA GARCIA-SILVA paid an undisclosed amount of money to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false information for their daughter, B [REDACTED] B [REDACTED] S [REDACTED]
47. That on or about November 2, 1982, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth certificate for B [REDACTED] B [REDACTED] S [REDACTED] at the Cameron County Clerk's Office.
48. That in or about November, 1982, a Texas birth certificate was issued by the Cameron County Clerk's Office to B [REDACTED] B [REDACTED] S [REDACTED]

COUNT 2

That from on or about November 3, 1978, to the present, within the Southern District of Texas, and elsewhere, FRANCISCA GARCES-MORENO, MARIO SILVA-VILLARREAL, MARIA MAGDALENA URIBE-SILVA, FRANCISCO SILVA-VILLARREAL, BERTA ALICIA GARCIA-SILVA, and HUMBERTO MIRELES-SALAZAR knowingly and intentionally did combine, conspire, confederate, and agree together and with each other and with other persons unknown to the Grand Jurors to knowingly procure or attempt to procure evidence of United States citizenship for certain persons knowing that such persons were not entitled thereto, in violation of Sections 371 and 1425(b), Title 18, United States Code.

That pursuant to and for the purpose of carrying out said unlawful combination, confederation, conspiracy, and agreement and to effectuate the objects thereof, the following and other overt acts were committed within the Southern District of Texas, and elsewhere:

Overt Acts

1. That in or about November, 1978, MARIO SILVA-VILLARREAL and MARIA MAGDALENA URIBE-SILVA met in Brownsville, Texas, with FRANCISCA GARCES-MORENO, a midwife.
2. That in or about November, 1978, in Brownsville, Texas, MARIO SILVA-VILLARREAL and MARIA MAGDALENA URIBE-SILVA paid an undisclosed amount of money to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false birth information of his son, M [REDACTED] S [REDACTED] J [REDACTED]
3. That on or about November 3, 1978, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth certificate for M [REDACTED] S [REDACTED], J [REDACTED], at the Cameron County Clerk's Office.
4. That in or about November, 1978, a Texas birth certificate was issued by the Cameron County Clerk's Office to M [REDACTED] S [REDACTED], J [REDACTED]
5. That in or about January, 1979, Gonzalo Garcia-Garcia met with FRANCISCA GARCES-MORENO in Brownsville, Texas.
6. That on or about February 10, 1979, Gonzalo Garcia-Garcia paid FRANCISCA GARCES-MORENO \$250 to obtain a Texas birth certificate for his daughter, G [REDACTED] A [REDACTED] G [REDACTED] based on false information.

7. That on or about February 14, 1979, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth certificate for G [REDACTED] A [REDACTED] G [REDACTED] at the Cameron County Clerk's Office.
8. That in or about February, 1979, a Texas birth certificate was issued to G [REDACTED] A [REDACTED] G [REDACTED] by the Cameron County Clerk's Office.
9. That in or about February, 1979, Maria Del Rosario Santa Cruz-Serna met with FRANCISCA GARCES-MORENO in Brownsville, Texas.
10. That in or about February, 1979, Maria Del Rosario Santa Cruz-Serna paid \$155 to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false information for her daughter P [REDACTED] S [REDACTED].
11. That on or about February 14, 1979, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth certificate for P [REDACTED] S [REDACTED] at the Cameron County Clerk's Office.
12. That in or about February, 1979, a Texas birth certificate was issued to P [REDACTED] S [REDACTED] by the Cameron County Clerk's Office.
13. That in or about February, 1979, Antonio Hernandez-Gonzalez met in Brownsville, Texas, with FRANCISCA GARCES-MORENO.
14. That in or about February, 1979, Antonio Hernandez-Gonzalez paid \$175 to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false information for his son A [REDACTED] d. J [REDACTED] H [REDACTED].

15. That on or about February 21, 1979, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth certificate for A [REDACTED] d. J [REDACTED] H [REDACTED] at the Cameron County Clerk's Office.
16. That in or about February, 1979, a Texas birth certificate was issued for A [REDACTED] d. J [REDACTED] H [REDACTED] by Cameron County Clerk's Office.
17. That in or about February, 1979, Matias Alejandro Lopez and Maria Margarita Garcia met with FRANCISCA GARCES-MORENO in Brownsville, Texas.
18. That in or about February, 1979, Matias Alejandro Lopez and/or Maria Margarita Garcia paid an undisclosed amount of money to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false information for their daughter Z [REDACTED] L [REDACTED]
19. That on or about February 28, 1979, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth certificate for Z [REDACTED] L [REDACTED] at the Cameron County Clerk's Office.
20. That in or about February, 1979, a Texas birth certificate was issued by the Cameron County Clerk's Office to Z [REDACTED] L [REDACTED]
21. That in or about February, 1979, FRANCISCO SILVA-VILLARREAL and BERTA ALICIA GARCIA SILVA met with FRANCISCA GARCES-MORENO in Brownsville, Texas.
22. That in or about February, 1979, in Brownville, Texas, FRANCISCO SILVA-VILLARREAL and BERTA ALICIA GARCIA-SILVA

- paid an undisclosed amount of money to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false information for their son, F [REDACTED] S [REDACTED], J [REDACTED]
23. That on or about February 28, 1979, FRANCISCA GARCES-MORENO filed, or caused to be filed a Texas birth certificate for F [REDACTED] S [REDACTED], J [REDACTED], at the Cameron County Clerk's Office.
24. That in or about February, 1979, a Texas birth certificate was issued by the Cameron County Clerk's Office to F [REDACTED] S [REDACTED], J [REDACTED]
25. That in or about March, 1979, Antonio Hernandez and Clara Vega met with FRANCISCA GARCES-MORENO in Brownsville, Texas.
26. That in or about March, 1979, Antonio Hernandez and Clara Vega paid an undisclosed amount of money to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false information for their daughter A [REDACTED] L [REDACTED] H [REDACTED]
27. That in or about March 12, 1979, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth certificate for A [REDACTED] L [REDACTED] H [REDACTED] at the Cameron County Clerk's Office.
28. That in or about March, 1979, a Texas birth certificate was issued by the Cameron County Clerk's Office to A [REDACTED] L [REDACTED] H [REDACTED]
29. That in or about March, 1979, Antonio Hernandez and Clara Vega met with FRANCISCA GARCES-MORENO in Brownsville, Texas.

30. That in or about March, 1979, Antonio Hernandez and Clara Vega paid an undisclosed amount of money to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false information for their son P [REDACTED] A [REDACTED] H [REDACTED].
31. That on or about March 12, 1979, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth certificate for P [REDACTED] A [REDACTED] H [REDACTED] at the Cameron County Clerk's Office.
32. That in or about March, 1979, a Texas birth certificate was issued by the Cameron County Clerk's Office to P [REDACTED] A [REDACTED] H [REDACTED].
33. That in or about June, 1980, HUMBERTO MIRELES-SALAZAR met with FRANCISCA GARCES-MORENO in Brownsville, Texas.
34. That in or about June, 1980, HUMBERTO MIRELES-SALAZAR paid an undisclosed amount of money to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false information for his daughter M [REDACTED] L [REDACTED] M [REDACTED].
35. That on or about June 6, 1980, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth certificate for M [REDACTED] L [REDACTED] M [REDACTED] at the Cameron County Clerk's Office.
36. That in or about June, 1980, a Texas birth certificate was issued by the Cameron County Clerk's Office to M [REDACTED] L [REDACTED] M [REDACTED].

37. That in or about June, 1981, HUMBERTO MIRELES-SALAZAR met with FRANCISCA GARCES-MORENO in Brownsville, Texas.
38. That in or about June, 1981, HUMBERTO MIRELES-SALAZAR paid an undisclosed amount of money to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false information for his son, H [REDACTED] M [REDACTED] J [REDACTED]
39. That on or about June 5, 1981, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth certificate for H [REDACTED] M [REDACTED] J [REDACTED], at the Cameron County Clerk's Office.
40. That in or about June, 1981, a Texas birth certificate was issued by the Cameron County Clerk's Office to H [REDACTED] M [REDACTED] J [REDACTED]
41. That in or about May, 1982, Maria Del Rosario Santa Cruz-Serna met with FRANCISCA GARCES-MORENO in Brownsville, Texas.
42. That in or about May, 1982, Maria Del Rosario Santa Cruz-Serna paid \$250 to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false information for her son R [REDACTED] S [REDACTED]
43. That in or about May 14, 1982, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth certificate for R [REDACTED] S [REDACTED] at the Cameron County Clerk's Office.
44. That in or about May, 1982, a Texas birth certificate was issued by the Cameron County Clerk's Office to R [REDACTED] S [REDACTED]

45. That in or about November, 1982, FRANCISCO SILVA-VILLARREAL and BERTA ALICIA GARCIA-SILVA met with FRANCISCA GARCES-MORENO in Brownsville, Texas.
46. That in or about November, 1982, FRANCISCO SILVA-VILLARREAL and BERTA ALICIA GARCIA-SILVA paid an undisclosed amount of money to FRANCISCA GARCES-MORENO to obtain a Texas birth certificate based on false information for their daughter, B [REDACTED] B [REDACTED] S [REDACTED]
47. That on or about November 2, 1982, FRANCISCA GARCES-MORENO filed, or caused to be filed, a Texas birth certificate for B [REDACTED] B [REDACTED] S [REDACTED] at the Cameron County Clerk's Office.
48. That in or about November, 1982, a Texas birth certificate was issued by the Cameron County Clerk's Office to B [REDACTED] B [REDACTED] S [REDACTED]

COUNT 3

That on or about November 3, 1978, in the Southern District of Texas, and within the jurisdiction of this Court, in a matter within the jurisdiction of the United States Immigration and Naturalization Service, an agency of the United States, FRANCISCA GARCES-MORENO, MARIO SILVA-VILLARREAL, and MARIA MAGDALENA URIBE-SILVA knowingly and wilfully by trick, scheme, and device, did make or cause to be made a false writing in a document containing a materially false, fictitious, and fraudulent statement, knowing that said document contained a false and fraudulent statement, regarding the birth of M [REDACTED] S [REDACTED], J [REDACTED], and FRANCISCA GARCES-MORENO, MARIO SILVA VILLARREAL, and MARIA MAGDALENA URIBE-SILVA

did make or cause to be made a Texas Certificate of Birth for the benefit of M [REDACTED] S [REDACTED] J [REDACTED], knowing that it contained a false and fraudulent statement regarding the birthplace of M [REDACTED] S [REDACTED], J [REDACTED], in violation of Sections 1001, and 2, Title 18, United States Code.

COUNT 4

That on or about February 14, 1979, in the Southern District of Texas, and within the jurisdiction of this Court, in a matter within the jurisdiction of the United States Immigration and Naturalization Service, an agency of the United States, FRANCISCA GARCES-MORENO knowingly and wilfully by trick, scheme, and device, did make or cause to be made a false writing in a document containing a materially false, fictitious, and fraudulent statement, knowing that said document contained a false and fraudulent statement, regarding the birth of G [REDACTED] A [REDACTED] G [REDACTED] and FRANCISCA GARCES-MORENO did make or cause to be made a Texas Certificate of Birth for the benefit of G [REDACTED] A [REDACTED] G [REDACTED] knowing that it contained a false and fraudulent statement regarding the birthplace of G [REDACTED] A [REDACTED] G [REDACTED] in violation of Sections 1001, and 2, Title 18, United States Code.

COUNT 5

That on or about February 14, 1979, in the Southern District of Texas, and within the jurisdiction of this Court, in a matter within the jurisdiction of the United States Immigration and Naturalization Service, an agency of the United States, FRANCISCA GARCES-MORENO knowingly and wilfully by trick, scheme, and device, did make or cause to be made a false writing in a

document containing a materially false, fictitious, and fraudulent statement, knowing that said document contained a false and fraudulent statement, regarding the birth of P [REDACTED] S [REDACTED] and FRANCISCA GARCES-MORENO did make or cause to be made a Texas Certificate of Birth for the benefit of P [REDACTED] S [REDACTED] knowing that it contained a false and fraudulent statement regarding the birthplace of P [REDACTED] S [REDACTED], in violation of Sections 1001, and 2, Title 18, United States Code.

COUNT 6

That on or about February 21, 1979, in the Southern District of Texas, and within the jurisdiction of this Court, in a matter within the jurisdiction of the United States Immigration and Naturalization Service, an agency of the United States, FRANCISCA GARCES-MORENO knowingly and wilfully by trick, scheme, and device, did make or cause to be made a false writing in a document containing a materially false, fictitious, and fraudulent statement, knowing that said document contained a false and fraudulent statement, regarding the birth of A [REDACTED] d [REDACTED] J [REDACTED] H [REDACTED] and FRANCISCA GARCES-MORENO did make or cause to be made a Texas Certificate of Birth for the benefit of A [REDACTED] d [REDACTED] J [REDACTED] H [REDACTED] knowing that it contained a false and fraudulent statement regarding the birthplace of A [REDACTED] d [REDACTED] J [REDACTED] H [REDACTED] in violation of Sections 1001, and 2, Title 18, United States Code.

COUNT 7

That on or about February 28, 1979, in the Southern District of Texas, and within the jurisdiction of this Court, in a matter

within the jurisdiction of the United States Immigration and Naturalization Service, an agency of the United States, FRANCISCA GARCES-MORENO knowingly and wilfully by trick, scheme, and device, did make or cause to be made a false writing in a document containing a materially false, fictitious, and fraudulent statement, knowing that said document contained a false and fraudulent statement, regarding the birth of Z [REDACTED] L [REDACTED] and FRANCISCA GARCES-MORENO did make or cause to be made a Texas Certificate of Birth for the benefit of Z [REDACTED] L [REDACTED] knowing that it contained a false and fraudulent statement regarding the birthplace of Z [REDACTED] L [REDACTED] in violation of Sections 1001, and 2, Title 18, United States Code.

COUNT 8

That on or about February 28, 1979, in the Southern District of Texas, and within the jurisdiction of this Court, in a matter within the jurisdiction of the United States Immigration and Naturalization Service, an agency of the United States, FRANCISCA GARCES-MORENO, FRANCISCO SILVA-VILLARREAL, and BERTA ALICIA GARCIA-SILVA knowingly and wilfully by trick, scheme, and device, did make or cause to be made a false writing in a document containing a materially false, fictitious, and fraudulent statement, knowing that said document contained a false and fraudulent statement, regarding the birth of F [REDACTED] S [REDACTED] J [REDACTED], and FRANCISCA GARCES-MORENO, FRANCISCO SILVA-VILLARREAL, and BERTA ALICIA GARCIA-SILVA did make or cause to be made a Texas Certificate of Birth for the benefit of F [REDACTED] S [REDACTED] J [REDACTED], knowing that it contained a false and fraudulent statement

regarding the birthplace of F [REDACTED] S [REDACTED] J [REDACTED], in violation of Sections 1001, and 2, Title 18, United States Code.

COUNT 9

That on or about March 12, 1979, in the Southern District of Texas, and within the jurisdiction of this Court, in a matter within the jurisdiction of the United States Immigration and Naturalization Service, an agency of the United States, FRANCISCA GARCES-MORENO knowingly and wilfully by trick, scheme, and device, did make or cause to be made a false writing in a document containing a materially false, fictitious, and fraudulent statement, knowing that said document contained a false and fraudulent statement, regarding the birth of A [REDACTED] L [REDACTED] H [REDACTED] and FRANCISCA GARCES-MORENO did make or cause to be made a Texas Certificate of Birth for the benefit of A [REDACTED] L [REDACTED] H [REDACTED] knowing that it contained a false and fraudulent statement regarding the birthplace of A [REDACTED] L [REDACTED] H [REDACTED] in violation of Sections 1001, and 2, Title 18, United States Code.

COUNT 10

That on or about March 12, 1979, in the Southern District of Texas, and within the jurisdiction of this Court, in a matter within the jurisdiction of the United States Immigration and Naturalization Service, an agency of the United States, FRANCISCA GARCES-MORENO knowingly and wilfully by trick, scheme, and device, did make or cause to be made a false writing in a document containing a materially false, fictitious, and fraudulent statement, knowing that said document contained a

false and fraudulent statement, regarding the birth of P [REDACTED]
A [REDACTED] H [REDACTED] and FRANCISCA GARCES-MORENO did make or cause
to be made a Texas Certificate of Birth for the benefit of P [REDACTED]
A [REDACTED] H [REDACTED] knowing that it contained a false and
fraudulent statement regarding the birthplace of P [REDACTED] A [REDACTED]
H [REDACTED] in violation of Sections 1001, and 2, Title 18, United
States Code.

COUNT 11

That on or about June 6, 1980, in the Southern District of
Texas, and within the jurisdiction of this Court, in a matter
within the jurisdiction of the United States Immigration and
Naturalization Service, an agency of the United States, FRANCISCA
GARCES-MORENO and HUMBERTO MIRELES-SALAZAR knowingly and wilfully
by trick, scheme, and device, did make or cause to be made a
false writing in a document containing a materially false,
fictitious, and fraudulent statement, knowing that said document
contained a false and fraudulent statement, regarding the birth
of M [REDACTED] I [REDACTED] M [REDACTED] and FRANCISCA GARCES-MORENO and
HUMBERTO MIRELES-SALAZAR did make or cause to be made a Texas
Certificate of Birth for the benefit of M [REDACTED] I [REDACTED] M [REDACTED]
knowing that it contained a false and fraudulent statement
regarding the birthplace of M [REDACTED] I [REDACTED] M [REDACTED] in violation
of Sections 1001, and 2, Title 18, United States Code.

COUNT 12

That on or about June 5, 1981, in the Southern District of
Texas, and within the jurisdiction of this Court, in a matter
within the jurisdiction of the United States Immigration and

Naturalization Service, an agency of the United States, FRANCISCA GARCES-MORENO and HUMBERTO MIRELES-SALAZAR knowingly and wilfully by trick, scheme, and device, did make or cause to be made a false writing in a document containing a materially false, fictitious, and fraudulent statement, knowing that said document contained a false and fraudulent statement, regarding the birth of H [REDACTED] M [REDACTED] J [REDACTED], and FRANCISCA GARCES-MORENO did make or cause to be made a Texas Certificate of Birth for the benefit of H [REDACTED] M [REDACTED] J [REDACTED], knowing that it contained a false and fraudulent statement regarding the birthplace of H [REDACTED] M [REDACTED] J [REDACTED], in violation of Sections 1001, and 2, Title 18, United States Code.

COUNT 13

That on or about May 14, 1982, in the Southern District of Texas, and within the jurisdiction of this Court, in a matter within the jurisdiction of the United States Immigration and Naturalization Service, an agency of the United States, FRANCISCA GARCES-MORENO knowingly and wilfully by trick, scheme, and device, did make or cause to be made a false writing in a document containing a materially false, fictitious, and fraudulent statement, knowing that said document contained a false and fraudulent statement, regarding the birth of R [REDACTED] S [REDACTED] and FRANCISCA GARCES-MORENO did make or cause to be made a Texas Certificate of Birth for the benefit of R [REDACTED] S [REDACTED] knowing that it contained a false and fraudulent statement regarding the birthplace of R [REDACTED] S [REDACTED], in violation of Sections 1001, and 2, Title 18, United States Code.

COUNT 14

That on or about November 2, 1982, in the Southern District of Texas, and within the jurisdiction of this Court, in a matter within the jurisdiction of the United States Immigration and Naturalization Service, an agency of the United States, FRANCISCA GARCES-MORENO, FRANCISCO SILVA-VILLARREAL, and BERTA ALICIA GARCIA-SILVA knowingly and wilfully by trick, scheme, and device, did make or cause to be made a false writing in a document containing a materially false, fictitious, and fraudulent statement, knowing that said document contained a false and fraudulent statement, regarding the birth of B [REDACTED] B [REDACTED] S [REDACTED] and FRANCISCA GARCES-MORENO, FRANCISCO SILVA-VILLARREAL, and BERTA ALICIA GARCIA-SILVA did make or cause to be made a Texas Certificate of Birth for the benefit of B [REDACTED] B [REDACTED] S [REDACTED] knowing that it contained a false and fraudulent statement regarding the birthplace of B [REDACTED] B [REDACTED] S [REDACTED], in violation of Sections 1001, and 2, Title 18, United States Code.

COUNT 15

That on or about November 3, 1978, within the Southern District of Texas, and within the jurisdiction of this Court, FRANCISCA GARCES-MORENO did unlawfully, wilfully, and knowingly aid and abet Mario Silva-Villarreal and Maria Magdalena Uribe-Silva, to obtain evidence of United States citizenship for M [REDACTED] S [REDACTED], J [REDACTED], knowing that said M [REDACTED] S [REDACTED], J [REDACTED], was not entitled thereto, in violation of Sections 1425 and 2, Title 18, United States Code.

COUNT 16

That from in or about January, 1979, to on or about February 14, 1979, within the Southern District of Texas, and within the jurisdiction of this Court, FRANCISCA GARCES-MORENO did unlawfully, wilfully, and knowingly aid and abet one Gonzalo Garcia-Garcia to obtain evidence of United States citizenship for G [REDACTED] A [REDACTED] G [REDACTED] knowing that said G [REDACTED] A [REDACTED] G [REDACTED] was not entitled thereto, in violation of Sections 1425 and 2, Title 18, United States Code.

COUNT 17

That on or about February 19, 1979, within the Southern District of Texas, and within the jurisdiction of this Court, FRANCISCA GARCES-MORENO did unlawfully, wilfully, and knowingly aid and abet one Maria Del Rosario Santa Cruz-Serna to obtain evidence of United States citizenship for P [REDACTED] S [REDACTED] knowing that said P [REDACTED] S [REDACTED] was not entitled thereto, in violation of Sections 1425 and 2, Title 18, United States Code.

COUNT 18

That on or about February 21, 1979, within the Southern District of Texas, and within the jurisdiction of this Court, FRANCISCA GARCES-MORENO did unlawfully, wilfully, and knowingly aid and abet one Antonio Hernandez-Gonzalez to obtain evidence of United States citizenship for A [REDACTED] d [REDACTED] J [REDACTED] H [REDACTED] knowing that said A [REDACTED] d [REDACTED] J [REDACTED] H [REDACTED] was not entitled thereto, in violation of Sections 1425 and 2, Title 18, United States Code.

COUNT 19

That on or about February 28, 1979, within the Southern District of Texas, and within the jurisdiction of this Court, FRANCISCA GARCES-MORENO did unlawfully, wilfully, and knowingly aid and abet Matias Alejandro Lopez and Maria Margarita Garcia to obtain evidence of United States citizenship for Z [REDACTED] L [REDACTED] knowing that said Z [REDACTED] L [REDACTED] was not entitled thereto, in violation of Sections 1425 and 2, Title 18, United States Code.

COUNT 20

That on or about February 28, 1979, within the Southern District of Texas, and within the jurisdiction of this Court, FRANCISCA GARCES-MORENO did unlawfully, wilfully, and knowingly aid and abet Francisco Silva-Villarreal and Berta Alicia Garcia-Silva to obtain evidence of United States citizenship for F [REDACTED] S [REDACTED] J [REDACTED], knowing that said F [REDACTED] S [REDACTED] J [REDACTED], was not entitled thereto, in violation of Sections 1425 and 2, Title 18, United States Code.

COUNT 21

That on or about March 12, 1979, within the Southern District of Texas, and within the jurisdiction of this Court, FRANCISCA GARCES-MORENO did unlawfully, wilfully, and knowingly aid and abet Antonio Hernandez and Clara Vega to obtain evidence of United States citizenship for A [REDACTED] L [REDACTED] H [REDACTED] knowing that said A [REDACTED] L [REDACTED] H [REDACTED] was not entitled thereto, in violation of Sections 1425 and 2, Title 18, United States Code.

COUNT 22

That on or about March 12, 1979, within the Southern District of Texas, and within the jurisdiction of this Court, FRANCISCA GARCES-MORENO did unlawfully, wilfully, and knowingly aid and abet Antonio Hernandez and Clara Vega to obtain evidence of United States citizenship for P [REDACTED] A [REDACTED] H [REDACTED] knowing that said P [REDACTED] A [REDACTED] H [REDACTED] was not entitled thereto, in violation of Sections 1425 and 2, Title 18, United States Code.

COUNT 23

That on or about June 6, 1980, within the Southern District of Texas, and within the jurisdiction of this Court, FRANCISCA GARCES-MORENO did unlawfully, wilfully, and knowingly aid and abet one Humberto Mireles-Salazar to obtain evidence of United States citizenship for M [REDACTED] I [REDACTED] M [REDACTED] knowing that said M [REDACTED] I [REDACTED] M [REDACTED] was not entitled thereto, in violation of Sections 1425 and 2, Title 18, United States Code.

COUNT 24

That on or about June 5, 1981, within the Southern District of Texas, and within the jurisdiction of this Court, FRANCISCA GARCES-MORENO did unlawfully, wilfully, and knowingly aid and abet one Humberto Mireles-Salazar to obtain evidence of United States citizenship for H [REDACTED] M [REDACTED], J [REDACTED], knowing that said H [REDACTED] M [REDACTED], J [REDACTED], was not entitled thereto, in violation of Sections 1425 and 2, Title 18, United States Code.

COUNT 25

That on or about May 14, 1982, within the Southern District of Texas, and within the jurisdiction of this Court, FRANCISCA

GARCES-MIRELES did unlawfully, wilfully, and knowingly aid and abet one Maria Del Rosario Santa Cruz-Serna to obtain evidence of United States citizenship for R [REDACTED] S [REDACTED] knowing that said R [REDACTED] S [REDACTED] was not entitled thereto, in violation of Sections 1425 and 2, Title 18, United States Code.

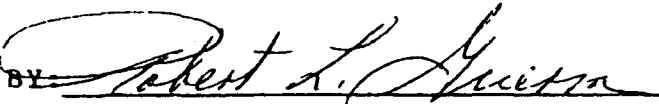
COUNT 26

That on or about November 2, 1982, within the Southern District of Texas, and within the jurisdiction of this Court, FRANCISCA GARCES-MORENO did unlawfully, wilfully, and knowingly aid and abet Francisco Silva-Villarreal and Berta Alicia Garcia-Silva to obtain evidence of United States citizenship for B [REDACTED] B [REDACTED] S [REDACTED] knowing that said B [REDACTED] B [REDACTED] S [REDACTED] was not entitled thereto, in violation of Sections 1425 and 2, Title 18, United States Code.

A TRUE BILL:

[REDACTED]
FOREMAN OF THE GRAND JURY

DANIEL K. HEDGES
UNITED STATES ATTORNEY

BY: 

ASSISTANT UNITED STATES ATTORNEY